

**COUNT 108**

**Cause of Action Pursuant to 18 U.S.C. § 2255**

**October 2004 – Incident 4**

449. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

450. On or about October 2004, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

451. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse

and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

452. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

**COUNT 109**

**Cause of Action Pursuant to 18 U.S.C. § 2255**

**November 2004 – Incident 1**

453. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

454. On or about November 2004, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e).

L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

455. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

456. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

**COUNT 110**

**Cause of Action Pursuant to 18 U.S.C. § 2255**

**November 2004 – Incident 2**

457. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

458. On or about November 2004, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

459. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and

psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

460. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

**COUNT 111**

**Cause of Action Pursuant to 18 U.S.C. § 2255**

**November 2004 – Incident 3**

461. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

462. On or about November 2004, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to

this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

463. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

464. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

**COUNT 112**

**Cause of Action Pursuant to 18 U.S.C. § 2255**

**November 2004 – Incident 4**

465. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

466. On or about November 2004, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

467. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These

injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

468. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

**COUNT 113**

**Cause of Action Pursuant to 18 U.S.C. § 2255**

**December 2004 – Incident 1**

469. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

470. On or about December 2004, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.



471. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

472. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

**COUNT 114**

**Cause of Action Pursuant to 18 U.S.C. § 2255**

**December 2004 – Incident 2**

473. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

474. On or about December 2004, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a

violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

475. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

476. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

**COUNT 115**

**Cause of Action Pursuant to 18 U.S.C. § 2255**

**December 2004 – Incident 3**

477. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

478. On or about December 2004, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

479. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past

suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

480. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

**COUNT 116**

**Cause of Action Pursuant to 18 U.S.C. § 2255**

**December 2004 – Incident 4**

481. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

482. On or about December 2004, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to

engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

483. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

484. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided

by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

**COUNT 117**

**Cause of Action Pursuant to 18 U.S.C. § 2255**

**January 2005 – Incident 1**

485. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

486. On or about January 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

487. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of

self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

488. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

**COUNT 118**

**Cause of Action Pursuant to 18 U.S.C. § 2255**

**January 2005 – Incident 2**

489. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

490. On or about January 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct,

child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

491. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

492. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.



**COUNT 119**

**Cause of Action Pursuant to 18 U.S.C. § 2255**

**January 2005 – Incident 3**

493. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

494. On or about January 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

495. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse

and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

496. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

**COUNT 120**

**Cause of Action Pursuant to 18 U.S.C. § 2255**

**January 2005 – Incident 4**

497. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

498. On or about January 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e).

L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

499. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

500. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

**COUNT 121**

**Cause of Action Pursuant to 18 U.S.C. § 2255**

**February 2005 – Incident 1**

501. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

502. On or about February 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

503. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and

psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

504. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

**COUNT 122**

**Cause of Action Pursuant to 18 U.S.C. § 2255**

**February 2005 – Incident 2**

505. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

506. On or about February 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to

this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

507. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

508. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

**COUNT 123**

**Cause of Action Pursuant to 18 U.S.C. § 2255**

**February 2005 – Incident 3**

509. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

510. On or about February 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

511. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These

injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

512. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

**COUNT 124**

**Cause of Action Pursuant to 18 U.S.C. § 2255**

**February 2005 – Incident 4**

513. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

514. On or about February 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.



515. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

516. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

**COUNT 125**

**Cause of Action Pursuant to 18 U.S.C. § 2255**

**March 2005 – Incident 1**

517. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

518. On or about March 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a

violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

519. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

520. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

**COUNT 126**

**Cause of Action Pursuant to 18 U.S.C. § 2255**

**March 2005 – Incident 2**

521. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

522. On or about March 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

523. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past

suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

524. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

**COUNT 127**

**Cause of Action Pursuant to 18 U.S.C. § 2255**

**March 2005 – Incident 3**

525. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

526. On or about March 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to

engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

527. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

528. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided

by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

**COUNT 128**

**Cause of Action Pursuant to 18 U.S.C. § 2255**

**March 2005 – Incident 4**

529. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

530. On or about March 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

531. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of

self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

532. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

**COUNT 129**

**Cause of Action Pursuant to 18 U.S.C. § 2255**

**April 2005 – Incident 1**

533. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

534. On or about April 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation

enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

535. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

536. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.



**COUNT 130**

**Cause of Action Pursuant to 18 U.S.C. § 2255**

**April 2005 – Incident 2**

537. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

538. On or about April 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

539. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse

and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

540. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

### **COUNT 131**

#### **Cause of Action Pursuant to 18 U.S.C. § 2255**

#### **April 2005 – Incident 3**

541. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

542. On or about April 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is

therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

543. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

544. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

**COUNT 132**

**Cause of Action Pursuant to 18 U.S.C. § 2255**

**April 2005 – Incident 4**

545. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

546. On or about April 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

547. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and

psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

548. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

**COUNT 133**

**Cause of Action Pursuant to 18 U.S.C. § 2255**

**May 2005 – Incident 1**

549. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

550. On or about May 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this

Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

551. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

552. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

**COUNT 134**

**Cause of Action Pursuant to 18 U.S.C. § 2255**

**May 2005 – Incident 2**

553. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

554. On or about May 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

555. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These

injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

556. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

**COUNT 135**

**Cause of Action Pursuant to 18 U.S.C. § 2255**

**May 2005 – Incident 3**

557. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

558. On or about May 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.



559. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

560. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

**COUNT 136**

**Cause of Action Pursuant to 18 U.S.C. § 2255**

**May 2005 – Incident 4**

561. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

562. On or about May 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of

numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

563. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

564. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right 137

**COUNT 137**

**Cause of Action Pursuant to 18 U.S.C. § 2255**

**June 2005 – Incident 1**

565. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

566. On or about June 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

567. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past

suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

568. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

### **COUNT 138**

#### **Cause of Action Pursuant to 18 U.S.C. § 2255**

#### **June 2005 – Incident 2**

569. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

570. On or about June 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to

engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

571. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

572. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided

by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

**COUNT 139**

**Cause of Action Pursuant to 18 U.S.C. § 2255**

**June 2005 – Incident 3**

573. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

574. On or about June 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

575. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of

self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

576. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

**COUNT 140**

**Cause of Action Pursuant to 18 U.S.C. § 2255**

**June 2005 – Incident 4**

577. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

578. On or about June 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct,

child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

579. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

580. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.



**COUNT 141**

**Cause of Action Pursuant to 18 U.S.C. § 2255**

**July 2005 – Incident 1**

581. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

582. On or about July 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

583. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse

and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

584. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

**COUNT 142**

**Cause of Action Pursuant to 18 U.S.C. § 2255**

**July 2005 – Incident 2**

585. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

586. On or about July 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is

therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

587. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

588. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

#### **COUNT 143**

#### **Cause of Action Pursuant to 18 U.S.C. § 2255**

**July 2005 – Incident 3**

589. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

590. On or about July 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

591. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and

psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

592. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

**COUNT 144**

**Cause of Action Pursuant to 18 U.S.C. § 2255**

**July 2005 – Incident 4**

593. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

594. On or about July 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this

Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

595. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

596. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

**COUNT 145**

**Cause of Action Pursuant to 18 U.S.C. § 2255**

**August 2005 – Incident 1**

597. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

598. On or about August 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

599. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These

injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

600. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

**COUNT 146**

**Cause of Action Pursuant to 18 U.S.C. § 2255**

**August 2005 – Incident 2**

601. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

602. On or about August 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.



603. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

604. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

**COUNT 147**

**Cause of Action Pursuant to 18 U.S.C. § 2255**

**August 2005 – Incident 3**

605. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

606. On or about August 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a

violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

607. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

608. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

**COUNT 148**

**Cause of Action Pursuant to 18 U.S.C. § 2255**

**August 2005 – Incident 4**

609. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

610. On or about August 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

611. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past

suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

612. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

**COUNT 149**

**Cause of Action Pursuant to 18 U.S.C. § 2255**

**September 2005 – Incident 1**

613. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

614. On or about September 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to

engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

615. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

616. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided

by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

**COUNT 10**

**Cause of Action Pursuant to 18 U.S.C. § 2255**

**September 2005 – Incident 2**

617. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

618. On or about September 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

619. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of

self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

620. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

**COUNT 151**

**Cause of Action Pursuant to 18 U.S.C. § 2255**

**September 2005 – Incident 3**

621. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

622. On or about September 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct,

child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

623. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

624. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.



**COUNT 152**

**Cause of Action Pursuant to 18 U.S.C. § 2255**

**September 2005 – Incident 4**

625. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

626. On or about September 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

627. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse

and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

628. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

**COUNT 153**

**Cause of Action Pursuant to 18 U.S.C. § 2255**

**October 2005 – Incident 1**

629. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

630. On or about October 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e).

L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

631. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

632. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

**COUNT 154**

**Cause of Action Pursuant to 18 U.S.C. § 2255**

**October 2005 – Incident 2**

633. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

634. On or about October 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

635. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and

psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

636. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

**COUNT 155**

**Cause of Action Pursuant to 18 U.S.C. § 2255**

**October 2005 – Incident 3**

637. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

638. On or about October 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to

this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

639. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

640. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

**COUNT 156**

**Cause of Action Pursuant to 18 U.S.C. § 2255**

**October 2005 – Incident 4**

641. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

642. On or about October 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

643. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These

injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

644. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper.

**DEMAND FOR JURY TRIAL**

Plaintiff hereby demands trial by jury on all issues triable as of right by a jury.

DATED July 24, 2009

Respectfully Submitted,



---

Bradley J. Edwards  
ROTHSTEIN ROSENFELDT ADLER  
Las Olas City Centre  
401 East Las Olas Blvd., Suite 1650  
Fort Lauderdale, Florida 33301  
Telephone (954) 522-3456  
Facsimile (954) 527-8663  
Florida Bar No.: 542075  
E-mail: [bedwards@rra-law.com](mailto:bedwards@rra-law.com)



JS 44 (Rev. 2/08)

## CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.) **NOTICE: Attorneys MUST Indicate All Re-filed Cases Below.**

## I. (a) PLAINTIFFS

L.M.

(b) County of Residence of First Listed Plaintiff Palm Beach  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorney's (Firm Name, Address, and Telephone Number)

Rothstein Rosenfeldt Adler  
401 East Las Olas Blvd., Suite 1650  
Fort Lauderdale, FL 33301 - Phone 954-522-3456

## DEFENDANTS

JEFFREY EPSTEIN

County of Residence of First Listed Defendant Palm Beach  
(IN U.S. PLAINTIFF CASES ONLY)NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT  
LAND INVOLVED.

Attorneys (If Known)

Bradley J. Edwards

(d) Check County Where Action Arose: ☐ MIAMI-DADE ☐ MONROE ☐ BROWARD ☒ PALM BEACH ☐ MARTIN ☐ ST. LUCIE ☐ INDIAN RIVER ☐ OKEECHOBEE  
HIGHLANDS

## II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

☐ 1 U.S. Government Plaintiff ☒ 3 Federal Question (U.S. Government Not a Party)☐ 2 U.S. Government Defendant ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

## III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

	PTF	DEF		PTF	DEF
Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4

Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5
--------------------------	----------------------------	----------------------------	---	----------------------------	----------------------------

Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6
---	----------------------------	----------------------------	----------------	----------------------------	----------------------------

## IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input checked="" type="checkbox"/> 360 Other Personal Injury	<input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 Amer. w/Disabilities Employment <input type="checkbox"/> 446 Amer. w/Disabilities Other <input type="checkbox"/> 440 Other Civil Rights	<b>PRISONER PETITIONS</b> <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition	<b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus-Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609
				<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes

## V. ORIGIN

(Place an "X" in One Box Only)

☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Re-filed- (see VI below) ☐ 4 Reinstated or Recopened ☐ 5 Transferred from another district (specify) ☐ 6 Multidistrict Litigation ☐ 7 Appeal to District Judge from Magistrate Judgment

## VI. RELATED/RE-FILED CASE(S).

(See instructions second page):

a) Re-filed Case ☐ YES ☒ NO b) Related Cases ☒ YES ☐ NO  
JUDGE DOCKET NUMBER 9:08-cv-80119

## VII. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing and Write a Brief Statement of Cause (Do not cite jurisdictional statutes unless diversity):

18 USC Section 2255

LENGTH OF TRIAL via 10-14 days estimated (for both sides to try entire case)

## VIII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23DEMAND \$ IN EXCESS 1,000,000.00CHECK YES only if demanded in complaint:  
JURY DEMAND: ☒ Yes ☐ No

ABOVE INFORMATION IS TRUE &amp; CORRECT TO THE BEST OF MY KNOWLEDGE

SIGNATURE OF ATTORNEY OF RECORD

DATE

FOR OFFICE USE ONLY

AMOUNT

RECEIPT #

IFP